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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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DEC 11 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ecology Services, Inc.
10220 Old Columbia Road
Columbia, MD 21046

**Re: Required Submission of Information
Safety Light Corporation Site
Bloomsburg, Pennsylvania**

Dear Sir or Madam:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Safety Light Corporation Site, which is an active manufacturing facility occupying approximately 2 acres of a 10-acre property adjacent to the Susquehanna River off Old Berwick Road, Bloomsburg, Columbia County, Pennsylvania (hereafter known as the "Site" or "Facility"). This information request addresses all periods of ownership and operation of any of Safety Light's predecessor or affiliated companies including, but not limited to, U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal and Isolite. Safety Light Corporation presently uses tritium in the manufacture of self-illuminated signs. Past disposal practices of various radioactive isotopes at the Site resulted in radiological contamination of on-site soils and groundwater.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require Ecology Services, Inc. (the terms "you," and "Respondent" mean Ecology Services, Inc. ["ESI"]) to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Facility.

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**U.S. Postal Service
CERTIFIED MAIL RECEIPT**

(Domestic Mail Only, No Insurance Coverage Provided)

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Sent To	Ecology Services, Inc.
Street, Apt. No., or PO Box No.	10220 Old Columbia Road
City, State, ZIP+4	Columbia, MD 21046

For use only by the U.S. Postal Service. See Reverse for Instructions.

Section 104 of CERCLA authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information are provided below.

INSTRUCTIONS

1. You may be entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure 1, *Business Confidentiality Claims/ Disclosure to EPA Contractors & Grantees of Your Response*. You must clearly mark such information by either stamping or using any other form of notice that such information is trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.
2. Please provide a separate, detailed narrative response to each question, and to each subpart of a question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.
3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question(s) or subpart of the question(s) to which it responds.
4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
5. Any terms that are used in this Information Request and/or its Enclosures, which are defined in CERCLA, shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure 2, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure 2. Those terms shall have the meaning set forth in Enclosure 2 any time such terms are used in this Information Request and/or its Enclosures.

INFORMATION REQUESTED

Please answer the following questions in accordance with the Instructions set forth above.

1. Describe in detail the business relationship between ESI and Safety Light.
2. Did ESI ever transport and/or broker hazardous substances and/or radioactive waste or other wastes to the Site (including, but not limited to, spent or expired "EXIT" signs or other devices, and the like), for disposal or reclamation?
3. If you answered "yes" to Question 2, please answer the following questions:
 - a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.
 - b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.
 - c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:
 - 1) the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);
 - 2) the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;
 - 3) the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;
 - 4) the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
 - 5) all personal and/or internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;

- 6) the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.
4. Did ESI ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?
5. If you answered "yes" to Question 4, please address the following issues:
 - a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:
 - 1) the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
 - 2) the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;
 - 3) the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
 - 4) the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
 - 5) the method of treatment and/or disposal of the above.
 - b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

- 1) disposed of or treated radioactive or hazardous materials at the Site;
 - 2) arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and
 - 3) arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:
- 1) the persons with whom you, or other such persons, made such arrangements;
 - 2) every date on which such arrangements took place;
 - 3) for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
 - 4) the precise locations at which each material was disposed or treated at the Site;
 - 5) the persons who selected the Site as the place at which materials were disposed or treated;
 - 6) the final disposition of each material involved in such transactions; and
 - 7) the names of employees, officers, owners, and agents for each transporter.
- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:

- 1) the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and
 - 2) any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.
- e. Provide the names, titles, and areas of responsibility of any persons, including all ESI employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.
 - f. Describe any permits or applications and any correspondence between ESI and any regulatory agencies regarding materials transported to or disposed of at the Site.
 - g. Provide copies of any correspondence between ESI and any third party regarding materials transported or disposed of at the Site.
 - h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
 - i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
 - j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.
 - k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

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6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.
7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.
8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in your response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.
9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:
 - a. Your document retention policy;
 - b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
 - c. A description of the type of information that would have been contained in the documents; and
 - d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

You must respond in writing to this required submission of information within **30 calendar days** of your receipt of this letter. For a corporation, the response must be signed by an appropriately authorized corporate official. For all other entities, the response must be signed by an authorized official of that entity.

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If, for any reason, you do not provide all information responsive to this letter, then in your answer to EPA you must: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

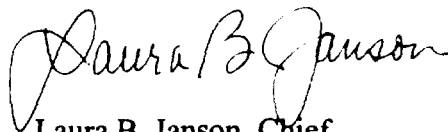
All documents and information should be sent to:

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this request for information, please contact Harry Steinmetz at (215) 814-3161. Legal questions can be referred to Humane Zia at (215) 814-3454.

Sincerely,



Laura B. Janson, Chief
Cost Recovery Branch

cc: Humane Zia (3RC41)
Mitch Cron (3HS21)
Dennis Matlock (3HS32)
Craig Olewiler (PADEP)
Larry Newcomer (PADEP)
Jeff Whitehead (PADEP)
Robert Prince (NRC)

Enclosures: 1: Business Confidentiality Claims/Disclosure of Your Response to EPA
Contractors and Grantees
2: Definitions
3: List of Contractors That May Review Your Response